

April 7, 2023

Representative Lori Houghton, Chair
Representative Topper McFaun, Vice Chair
Representative Alyssa Black, Ranking Member
Representative Daisy Berbeco
Representative Melanie Carpenter
Representative Brian Cina
Representative Mari Cordes
Representative Allen Demar
Representative Bobby Farlice-Rubio
Representative Leslie Goldman
Representative Arthur Peterman

Dear Members of the House Health Care Committee,

Blue Cross and Blue Shield of Vermont is strongly in favor of legislation that protects our members' access to abortion and gender affirming care. As part of the effort to protect access to care, we need to ensure that employers, insurers and individuals who provide coverage for health services as well. We wholly support the protections contained in the Senate-passed version of S.37, an act relating to access to legally protected health care activity and regulation of health care providers.

Definitions of Legally Protected Health Care Activity:

The definition in Section 1 (b)(1)(C) adds the provision, issuance, or use of, or enrollment in, insurance or other health coverage . . . and is an important aspect of the protections in the bill.

Coverage for Abortion and Gender Affirming Care:

Blue Cross VT has long supported our members' access to abortion care and gender affirming care. We spoke out publicly against political attacks against transgender youth and their families, and the decision of the U.S. Supreme Court that altered five decades of law protecting an individual's ability to choose how they receive health care.

Insurance coverage for abortion and gender affirming care are included in the [Vermont Essential Health Benefits Benchmark Plan](#), so the changes proposed will have minimal to no impact on premiums because these services are already included in our plan's coverage; they also align with existing definitions, guidelines and Department of Financial Regulation [Insurance Bulletin #174](#). Treatments, research, and guidelines for care are constantly evolving, which is what guided our advocacy in the Senate to allow for flexibility and adjustments to the latest standards of care.

Eliminating cost share for abortion:

Generally, eliminating cost-share for medical services or pharmaceuticals either increases premiums or, in the case of Qualified Health Plans sold on the Exchange that have federally mandated actuarial values (AV), increases the costs of other necessary health care services. Additionally, [IRS regulations](#) prohibit “first-dollar” coverage for High Deductible Health Plans (HDHP) that are paired with Health Savings Accounts and Health Reimbursement Accounts (HSAs and HRAs).

With these factors in account, the impact of eliminating cost-share for abortion coverage will be minimal.

We thank you for your efforts to protect access to abortion and gender affirming care for patients, providers and payers. Your efforts build on long-established health insurance coverage for these services in Vermont.

Sincerely,

A handwritten signature in cursive script that reads "Sara Teachout".

Sara Teachout
Corporate Director, Government and Media Relations

